Understanding the National Environmental Policy Act (NEPA) in Relation to Land-Rehabilitation and Maintenance (LRAM) Projects

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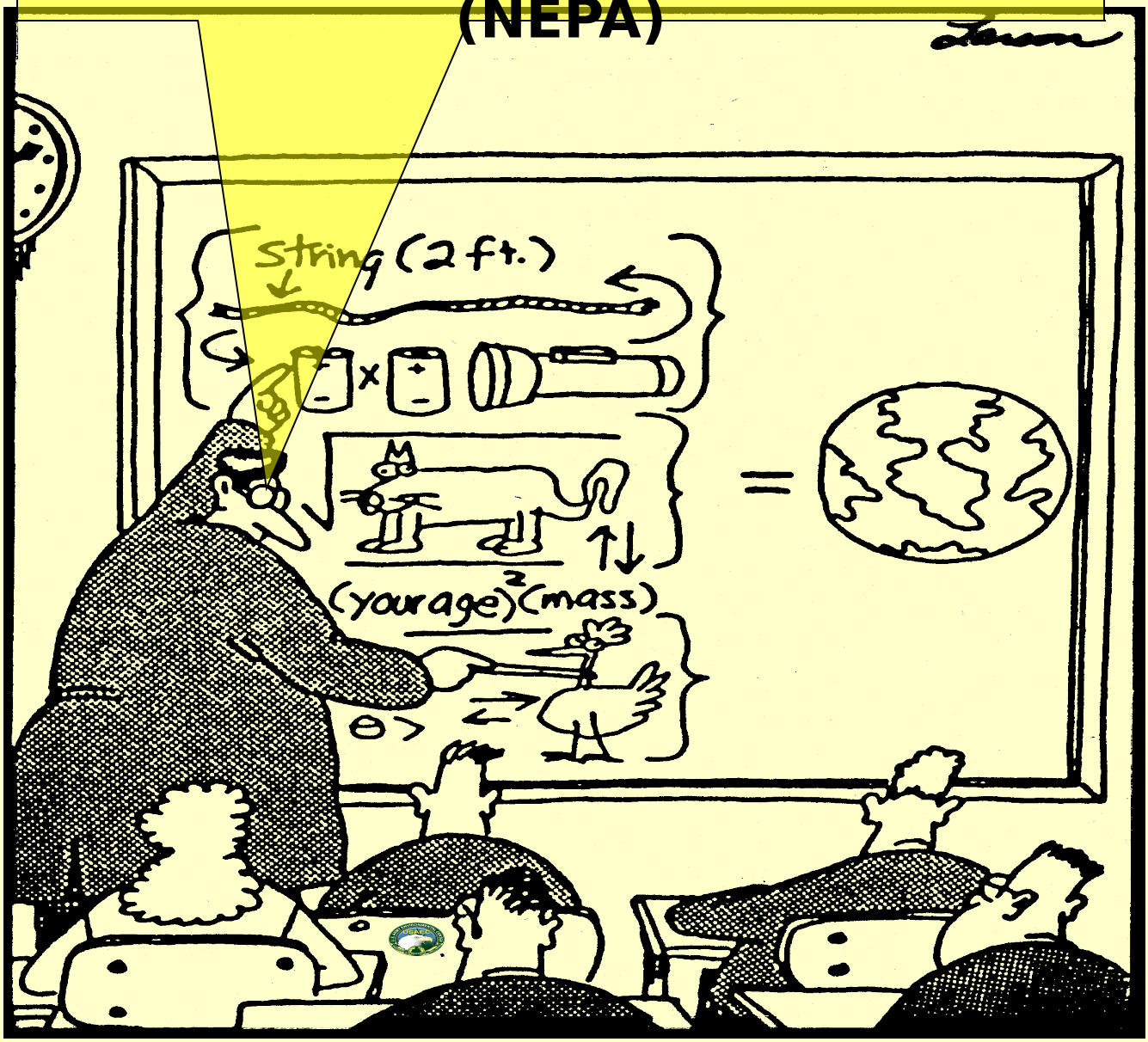
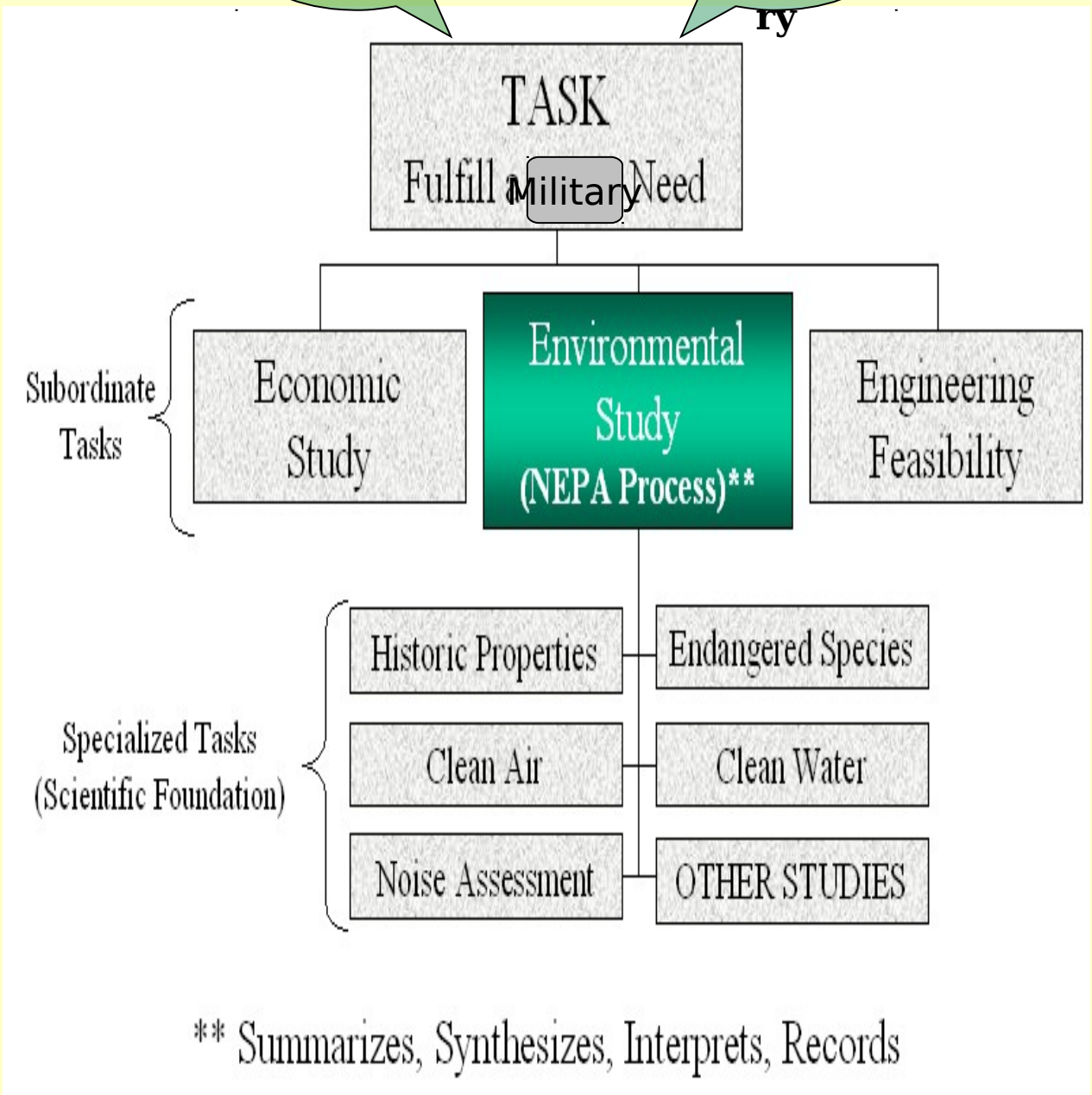
TODAY: The National Environmental Policy Act of 1969 (NEPA)



- **A systematic, interdisciplinary, administrative-process to improve Federal decision-making**

- **Mechanism to integrate consideration of the environment into analysis of Federal policy, program, plan and activity alternatives**

Environmental Planning Procedural Model



ITAM GOALS

- a systematic framework for decision-making and management of Army training lands
- integrates elements of operational, environmental, master planning, and other programs that identify and assess land use alternatives

➢Four Components:

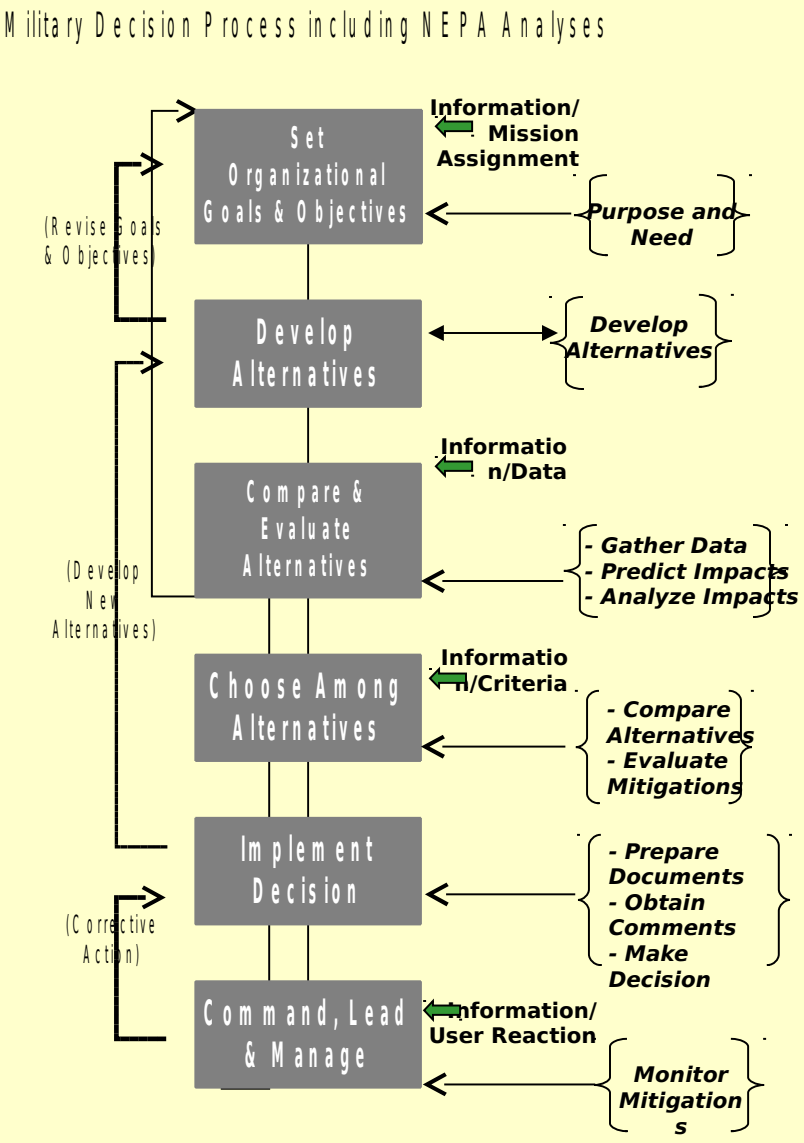
1.Land Condition Trend Analysis (LCTA)

2.Training Requirements Integration (TRI)

3.Land Rehabilitation and Maintenance (LRAM)

4.Environmental Awareness (EA)

Military Decision Process including NEPA Analyses



Revise/Set New Goals & Objectives

What About ITAM?

RTLP

TRI

LCTA

LRAM

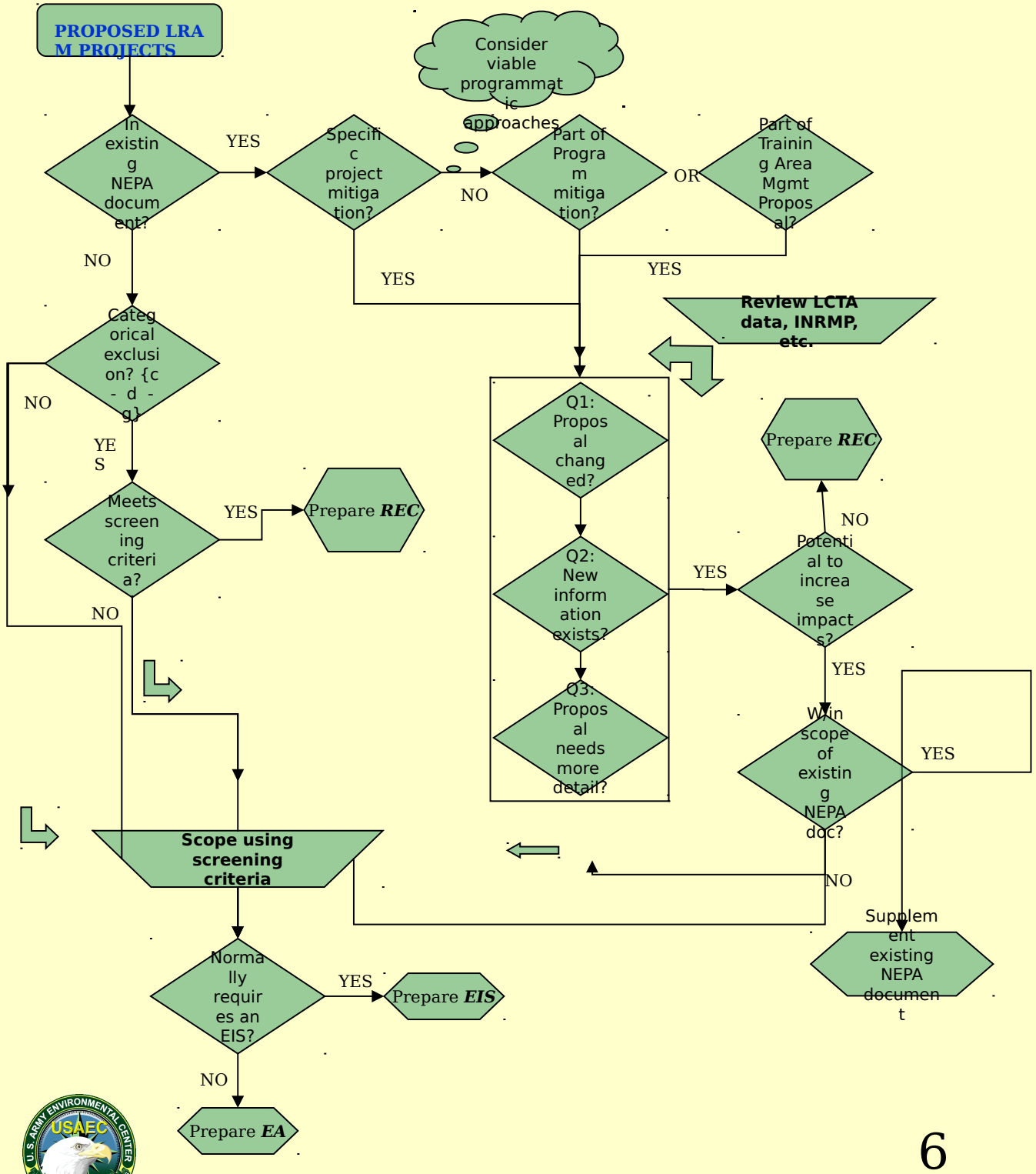
1. identify requirements
2. identify sites for 3 Rs
3. scope of work
4. prioritize projects
5. execute projects
6. evaluate success
7. preventative maintenance
8. long term integrated planning

ICTA

EA

Military Decision Process | **NEPA Process** | **ITAM**

LRAM INCORPORATION INTO NEPA



PROPOSED LRAM PROJECTS

(1) Mitigate or counteract degradation of training and maneuver lands

(2) Aimed at maintenance, rehabilitation, restoration or reconfiguration to preserve training land availability in concert with stewardship goals

HOWEVER --

(3) LRAM projects involve ground/resource disturbance

AND

(4) Should be addressed in NEPA assessments as mitigation for training impacts or as part of an overall land resource management program proposal

Categorical exclusion?
(c) Construction and demolition

(1) Construction of an addition to an existing structure or new construction on a previously undisturbed site if the area to be disturbed has no more than 5.0 cumulative acres of new surface disturbance. This does not include construction of facilities for the transportation, distribution, use, storage, treatment, and disposal of solid waste, medical waste, and hazardous waste (REC required).

(2) Demolition of non-historic buildings, structures, or other improvements and disposal of debris therefrom, or removal of a part thereof for disposal, in accordance with applicable regulations, including those regulations applying to removal of asbestos, polychlorinated biphenyls (PCBs), lead-based paint, and other special hazard items (REC required).

(3) Road or trail construction and

Categorical exclusion?

(d) Cultural and natural resource management activities

(1) Land regeneration activities using only native trees and vegetation, including site preparation. This does not include forestry operations (REC required).

(2) Routine maintenance of streams and ditches or other rainwater conveyance structures (in accordance with USACE permit authority under Section 404 of the Clean Water Act and applicable state and local permits), and erosion control and stormwater control structures (REC required).

(4) Studies, data collection, monitoring and information gathering that do not involve major surface disturbance. Examples include topographic surveys, bird counts, wetland mapping, and other resources inventories (REC required). (LCTA)

(5) Maintenance of archaeological, historical, and endangered/threatened species avoidance markers, fencing, and signs. (EA)

Categorical exclusion?
(g) Repair and maintenance activities

(2) Routine repairs and maintenance of roads, trails, and firebreaks. Examples include, but are not limited to: grading and clearing the roadside of brush with or without the use of herbicides; resurfacing a road to its original conditions; pruning vegetation, removal of dead, diseased, or damaged trees and cleaning culverts; and minor soil stabilization activities.

Conclusions

• The ITAM program and its components aim at achieving the integration of environmental endurance within the societal goals reflected by the military training construct

• LRAM is the remedy and maintenance portion of that construct

• To fully meet the goals of the NEPA, LRAM projects should be addressed within an environmental impact assessment of the larger program of Training Area Management

or

• As mitigations to impacts from a planned program of training and maneuver activities